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March 10, 2000


Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **March 2000 Monthly Report**

Dear Mr. McAteer,

Enclosed is the March 2000 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,


D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: March 10, 2000
Period Covered: February 1, 2000 - February 29, 2000
Next Report Period: March 1, 2000 - March 31, 2000

Work Performed during the reporting period

1. Continued collection of downgradient and upgradient alluvial aquifer samples.
2. Continued collection of groundwater level readings.
3. Completed sediment sampling and sediment depth measurement in Dead Creek, the Borrow Pit lake and Old Prairie du Pont Creek.
4. Collected surface water samples in Old Prairie du Pont Creek.
5. Completed boundary test trenching on Site N and interior trenching on Sites G, L & H.
6. At the request of U. S. EPA, performed supplemental boundary test trenching on the southern boundary of Site G.
7. Began bedrock drilling at Site H.

Data Submittal (Copy to M. McAteer only)

- There is no data to report this period.

Work scheduled for next reporting period

1. Perform slug testing in piezometers adjacent to Sites G, H, I, L and N (3 at each site).
 2. Complete well construction and sample bedrock wells at Sites G, H & I.
 3. Continue alluvial aquifer groundwater sampling.
 4. Conduct sample collection for treatability studies / pilot test.
 5. Perform Quarterly GW elevation monitoring.
 6. Complete boundary and center trenching on Site I.
 7. Conduct ground Penetrating Radar on Site I..
 8. Define the western boundary of Site G.
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Problems and Solutions

1. Boundary Trenching and Center Trenching on Site I continued to be delayed because Cerro Copper had not granted access for those purposes. Following protracted discussions among Cerro, Solutia and U. S. EPA and under an access Order issued by U. S. EPA to Cerro Copper on March 10, 2000, Solutia will be granted limited access to Site I to conduct as much of the AOC required boundary and center trenching as possible. Access to Site I will be allowed on Saturday, March 11, 2000 and Sunday, March 12, 2000 between the hours of 8:15 AM and 3:45 PM. If, as projected, the required boundary and center trenching is not completed within the allotted time, additional discussions among Cerro, Solutia and U. S. EPA will be required to reach agreement on plans for completion of the Work.
2. Delays continued to be encountered in defining the western boundary of Site G due to Weise's refusal to grant timely access to his property. However, after protracted discussions between U. S. EPA and representatives of Weise, negotiations were successfully concluded between Solutia and Weise resulting in Solutia being granted access to the Weise property for the remaining Work. This Work is now scheduled for the week of March 13, 2000.

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Issues under review

UAO to address flooding

Background

U. S. EPA UAO - Docket No. V-W-99-C-554 - dated June 21, 1999 was issued to Solutia and received June 28, 1999. The UAO requires replacement of the culverts on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for

the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove contaminated sediments from Sector B and contain in an on-site double lined containment cell. On November 8, 1999, Solutia submitted an evaluation of alternatives to an on-site containment cell for dealing with the contaminated sediments from Sector B. An on-site containment is the recommended course of action to address the UAO concerns.

This Report Period

1. After an Order was issued to Terminal Railroad, Solutia successfully concluded negotiations of an access agreement with Terminal Railroad on February 9, 2000, allowing Solutia to enter the property to perform the UAO required Work at the Terminal RR crossing. The geotechnical investigatory work for culvert replacement was completed immediately thereafter. Solutia also began to perform the clearing and grubbing portion of the Work on February 28, 2000.
2. U. S. EPA held a public meeting on February 29, 2000 at the Sauget Village Hall to review, among other issues, the Dead Creek sediment removal and on-site containment cell project. Solutia and USEPA continued to discuss development of a UAO to remove the sediments in Dead Creek and contain them in an on-site containment cell.

Plans for Next Report Period

1. Continue to develop the design for the culverts at Cargill Road and the Terminal Railway crossing. Obtain approval of the designs from U. S. EPA, the County and Terminal Railway. Procure materials for the culvert replacement.
2. Complete discussions with U. S. EPA on the Dead Creek Sediment Removal and Containment Cell UAO.

Comments:

None

January 21, 1999 Sauget Area I AOC
SCHEDULE

(11/99 Revision)

- | | |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start
of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 13, 1999 ⁴
September 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶
September 17, 1999 ⁷
October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved September 9, 1999 |
| 8. Submit Quality Assurance and
Sampling Plan (QAPP) | Approved September 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(11/99)

9. Sampling Notification	10 Business Days Prior to Start of Work ⁹
10. Submit Data Report	01/09/01 ¹⁰
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 ¹¹

⁹ Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹¹ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.